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# 2 0 2 5 - W H E N ?

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## When will Aviation Regulations accept NVET Qualification?

A review of other mature civil aviation systems clearly identifies how immature our regulatory system is and the lack of an all-government approach to giving effect to Convention Annexes. Mature systems refer to completion of specific courses and/or education qualifications underpinning each AME licence.

### Why is this?

*{ICAO Doc 10098 - Manual on Competency-based Training and Assessment for Aircraft Maintenance Personnel. 2021}*

***"1.1.3** The aviation industry is **becoming more globalized, and, with the outsourcing of maintenance**, there is a need for the AMP **competency to be harmonized to enable the global transferability of AMP**. To ensure the quality of maintenance and the safe operation of aircraft, the aviation industry has to find solutions to these additional training demands and requirements while ensuring acceptable competency standards for all AMP."*

**Note**: Australia's Competency-based training and assessment (CBTA) is very mature and is a mature method that can provide acceptable competency standards for Australian AMP that can be recognised by CASA.

***"1.3.4**. These regulations **vary substantially from one country to another** in the scope of the privileges, training, experience and examination requirements. **This wide variance hampers the aircraft maintenance industry because it limits the exchange of personnel between States and the possibility to outsource maintenance work from one State to another.***

***1.8.1** As AMP play a **significant role in the safe operation of an aircraft**, the Annexes to the Convention on International Civil Aviation require that they be appropriately trained."*

*"Annex 1 also provides requirements for the certification authorization of AMOs to appoint non licensed personnel to certify completion of maintenance. e.g. workshops and base maintenance."*

Australia's CBT legislation requires specific details to be recorded so a CBT course can be approved within the VET system as it is in many other countries, including EU/EASA. Some detail, e.g. course duration, needed by the education system to allocate funding and resources for these CBT courses.

CASA is responsible for standard setting but won't promulgate EASA AMP course durations needed to attain Australian AMP training harmonised with the EASR Parts 66/147 system. **WHY?**

The Australian Bureau of Stats has worked with their NZ counterpart to replace **ANZCO** with **OSCA.**

The **Occupation Standard Classification for Australia**.

| | |
|---|---|
| **332131 Aircraft Maintenance Technician (Avionics)** | **Skill Level 3** |
| **332132 Aircraft Maintenance Technician (Mechanical)** | **Skill Level 3** |
| **332133 Aircraft Maintenance Technician (Structures)** | **Skill Level 3** |
| **332134 Licensed Aircraft Maintenance Engineer**. | **Skill Level 2** |

NZ, see About the National Occupation List | Stats NZ.

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- **Skill Level 2**: Requires a **Diploma,** Advanced Diploma, or Associate Degree.
- **Skill Level 3**: Requires a **Certificate III or IV,** often combined with two years of on-the-job training.
- Skill Level 4: Requires a **Certificate II or III**, sometimes paired with additional experience.

# When will Part 21 meet Global Standards?

Ever since several Federal Ministers supported the making CASR Part 21 (1998), stating in numerous parliamentary speeches that this regulation will enable Australian certified Supplemental Type Certificates, Parts Manufacturing Authorisations, Technical Standard Orders to be marketed domestically and globally, government has not opened these markets.

**It simply has not happened globally.**

## Why is this?

The FAA, EASA, TCCA, Brazil and many others have made many changes to their certification procedures/processes in the last 30 years to make their Part 21, or equivalent, globally harmonised, but not Australia. We are still stuck in the unique non harmonised regulatory system of the 1990s.

For example, CASR Part 21 refers to Class 1, 2 & 3 products that haven't been used globally since mid-2000s when the FAA removed them from their Part 21. CASR Part 21 is **unique and dated regulations**.

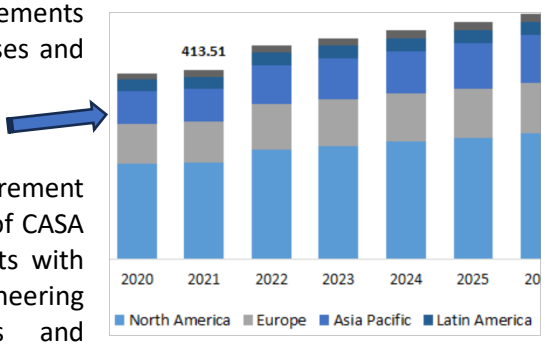
> *"**Class I product**: A complete aircraft, aircraft engine, or propeller, that:*
> - *has been type certificated in accordance with CASA regulations and for which civil specifications or type certificate data sheets have been issued; or*
> - *is identical to a type certificated product specified above in all respects except as is otherwise acceptable to the National Aviation Authority (NAA) of the importing state.*
>
> ***Class II product**: A major component of a Class I product (for example, wings, fuselages, empennage assemblies9, landing gears, power transmissions and control surfaces), the failure of which would jeopardise the safety 9of a Class I product; or any part, material, or appliance, approved and manufactured under an ATSO in the 'C' series.*
>
> ***Class III product**: Any part or component which is not a Class I or Class II product."*

How can government talk about supporting Australian manufacturing/maintenance services to compete globally unless the government promotes the businesses and implement aviation mutual recognition agreements with other nations to enable Australian aviation business to sell their CASA certified products in other nations and/or provide maintenance services for other nation's aircraft?

> e.g. "2020 (The European Union Aviation Safety Agency (EASA) and Civil Aviation Authority Singapore (CAAS) have updated their bilateral Working Arrangement, to facilitate CAAS' validation of EASA aircraft type certifications. The amendment to the Working Arrangement on Airworthiness Certification will allow the two regulators to collaborate on facilitating aviation innovations, such as eVTOL aircraft."

2025 and CASA approved manufacturers and maintenance service providers are still waiting for the benefits of adopting and maintaining a dated 1998 FAR Part 21, a version that no longer exists.

Government/CASA has never kept CASR Part 21 harmonised with FAR Part 21 to the detriment of Australian businesses. Without nation-to-nation agreements based on harmonised regulations, procedures, processes and documentation, there is no global trade.




The Asia Pacific Region projected growth is positive.

Government/industry in mid 1990s removed the requirement for CASA to **promote aviation** thus removing the role of CASA to promote and attain mutual recognition agreements with other nations of the Australian civil aviation engineering regulatory system and government certificates and organisation approvals. Refer next Article.

**Without these Nation to Nation, Regulator to Regulator agreements, Australian civil aviation manufacturing and maintenance services have no global recognition.**

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# When will we be Australasian, Asia/Pacific or Globally Harmonised?

Government departments and/or agencies are not empowered to 'promote' civil aviation engineering globally or to negotiate international mutual recognition agreements.

**In the early 1990s, the CAA agency started a program to harmonise with NZ, time to complete.**

## Why is this?

CASA in the 1999 set up a Memorandum of Understanding with New Zealand that was the foundation for many other agreements that were on offer at that time. To look at what could have been attained, you only need to click on the NZ link below and open the agreement's various links to other countries.

**The Solution, if mirrored:** International agreements and arrangements | aviation.govt.nz

We only have to look over the pond to see a more sensible Act administering civil aviation. Their Act is modern and practical and is much broader than CASA's limited administrative role. Australia's split department/agencies system obviously sees the previous role to arrange international agreements in the manufacturing/maintenance services sectors has fallen through the cracks and no longer a responsibility of a department or agency.

*NZ Civil Aviation Act*

***14A Functions of Minister***

*The functions of the Minister under this Act are—*

*(a) to promote safety in civil aviation:*

*(b) to administer New Zealand's participation in the Convention and any other international aviation convention, agreement, or understanding to which the Government of New Zealand is a party:*

*(c) to administer the Crown's interest in the aerodromes referred to in Part 10:*

*(d) to make rules under this Act.*

Refer to NZ's International agreements and arrangements link above to the multiple agreements that CAA(NZ) has been able to sign over the last few years.

> ***"NZ Act 7B j) to enter into technical or operational arrangements, or both, with civil aviation authorities of other countries."***

This regulatory role is missing from Australian legislation.

The FAA's Aviation Safety – International Agreements list all nations with agreements with the FAA.

- Note the differences listed against each nation, including Australia.
- E.g. When will there be a "***Letter of Intent for Cooperation in Electric Vertical Take-off and Landing (eVTOL) Aircraft***" that the FAA has with other nations?

"*The bilateral relationships between **EASA** (European Union Aviation Safety Agency), the **FAA** (Federal Aviation Administration, USA), and **Transport Canada Civil Aviation** (TCCA) are based on a framework of agreements and implementation procedures that allow for cooperation in airworthiness certification safety oversight, and maintenance. These agreements aim to streamline the certification processes, enhance safety, and **reduce duplication of effort for the aviation industry in Europe, the United States, and Canada.***

- *A key part of this framework includes the **Technical Implementation Procedures** (TIP) and the Maintenance Annex Guidance (MAG), which outline specific roles, processes, and responsibilities for how these agencies collaborate. Let's explore the overall relationship while emphasizing the role of TIP and MAG.*"

**Many Australian civil aviation engineering businesses would like to trade in many of these countries especially in the Asia/Pacific Region.**

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